

CLAIM AMENDMENTS

1. (currently amended) A method for assisting navigation of digital content using a tangible medium, comprising:
  - receiving an instruction to access digital content corresponding to a portion of a tangible medium:
  - said medium being readable by a user-positionable input device, and
  - said digital content being accessible from a stored file;
  - determining and accessing stored digital content corresponding to said ~~user's~~ input device's instantaneous position on said tangible medium; and
  - enabling electronic navigation of said digital content including enabling toggling between browsing of said tangible medium and browsing of said digital content on a computer screen using said input device.
2. (currently amended) The method of claim 1, further comprising:
  - determining a change in position of said input device on said tangible medium;
  - and
  - obtaining a new stored file corresponding to said change in position.
3. (currently amended) The method of claim 1, wherein said determining and accessing stored digital content includes:
  - obtaining digital signals representing a localized region of said tangible medium, said localized region being proximate to said position of said input device on said tangible medium;
  - determining at least one stored file corresponding to said localized region, and containing said digital content, by using pattern matching; and
  - retrieving an appropriate portion of said file to enable user navigation.
4. (original) The method of claim 3, wherein said pattern matching is based on correlating a pattern within said localized region with a pattern in said stored file.

5. (original) The method of claim 3, wherein said pattern matching is based on correlating a pattern embedded within said medium itself.
6. (original) The method of claim 3, wherein said tangible medium was previously created independently of said file.
7. (currently amended) The method of claim 1, wherein said determining and accessing stored digital content includes:
  - obtaining coordinates of said position of said input device on said tangible medium;
  - determining at least one stored file corresponding to said position and containing said digital content;
  - determining coordinates within said stored file, corresponding to said input device position coordinates, by using coordinate mapping; and
  - using said determined coordinates to retrieve an appropriate portion of said file to enable user navigation.
8. (original) The method of claim 7, wherein said coordinate mapping involves a linear transformation from tangible medium coordinates to stored file coordinates.
9. (original) The method of claim 7, wherein at least one of said tangible medium and said stored file includes a grid system.
10. (original) The method of claim 7, wherein said determining said stored file includes utilizing a file index read from said tangible medium.
11. (currently amended) The method of claim 7, wherein ~~said~~ a file index was previously generated during creation of said tangible medium.
12. (currently amended) The method of claim 7 wherein;

said tangible medium includes a plurality of machine-readable patterns embedded in said medium itself; and

said obtaining coordinates of said position of said input device is based on reading a unique pattern at said position of said input device, and analyzing said unique pattern to determine said coordinates.

13. (original) The method of claim 1, wherein said digital content includes an image, and said navigation includes displaying said image.
14. (original) The method of claim 1, wherein said digital content includes audio, and said navigation includes playing said audio.
15. (original) The method of claim 1, wherein said tangible medium serves as a video storyboard.
16. (original) The method of claim 1, wherein said navigation includes at least one user-selectable mode.
17. (original) The method of claim 16, wherein said modes are designated on, and selectable from, said tangible medium.
18. (original) The method of claim 1, wherein said tangible medium includes paper.
19. (original) The method of claim 1, wherein said input device includes an optical device.
20. (original) The method of claim 1, wherein said input device includes a radio frequency device.
21. (original) The method of claim 1, wherein said tangible medium is two-dimensional, yet includes three-dimensional information.

22. (canceled).

23. (original) The method of claim 1, wherein said tangible medium was previously created using said stored file.

24. (original) The method of claim 1 implemented in a handheld portable electronic device.

25. (currently amended) A computer-readable storage medium for assisting navigation of digital content using a tangible medium, comprising logic instructions that when executed:

receive an instruction to retrieve digital content corresponding to a portion of a tangible medium:

said medium being readable by a user-positionable input device; and

said digital content being accessible from a stored file;

determine and retrieve stored digital content corresponding to said ~~user's~~ input device's instantaneous position on said tangible medium; ~~and~~

enable electronic navigation of said digital content; and

enable toggling between browsing of said tangible medium and browsing of said digital content on a computer screen using said input device.

26. (currently amended) The computer-readable storage medium of claim 25, wherein said logic instructions that determine and retrieve stored digital content include logic instructions that when executed:

obtain digital signals representing a localized region of said tangible medium, said localized region being proximate to said position of said input device on said tangible medium;

determine at least one stored file corresponding to said localized region, and containing said digital content, by using pattern matching; and

access an appropriate portion of said file to enable user navigation.

27. (currently amended) The computer-readable storage medium of claim 25, wherein said logic instructions that determine and retrieve stored digital content include logic instructions that when executed:

- obtain coordinates of said position of said input device on said tangible medium;
- determine at least one stored file corresponding to said position and containing said digital content;
- determine coordinates within said stored file, corresponding to said input device position coordinates, by using coordinate mapping; and
- use said determined coordinates to access an appropriate portion of said file for navigation by said user.

28. (currently amended) A system for assisting navigation of digital content using a tangible medium, comprising:

- means for receiving an instruction to access digital content corresponding to a portion of a tangible medium:

- said medium being readable by a user-positionable input device; and
  - said digital content being accessible from a stored file;

- means for determining and accessing stored digital content corresponding to said user's input device's instantaneous position on said tangible medium; ~~and~~

- means for enabling electronic navigation of said digital content; and

- means for enabling toggling between browsing of said tangible medium and browsing of said digital content on a computer screen using said input device.

29. (currently amended) A system for assisting navigation of digital content using a tangible medium, comprising:

- an interface configured to receive an instruction from an input device to access digital content corresponding to a portion of a tangible medium:

- said medium being readable by said input device; and

- said digital content being accessible from a stored file; and

- a processor configured to:

determine and access digital content corresponding to said ~~user's~~ input device's position on said tangible medium; ~~and;~~  
enable electronic navigation of said digital content; and  
enable toggling between browsing of said tangible medium and browsing of said digital content on a computer screen using said input device.

30. (currently amended) The system of claim 29, wherein said processor is further configured to:

obtain digital signals representing a localized region, of said tangible medium, that is proximate to said position of said input device on said tangible medium;  
determine at least one stored file corresponding to said localized region, and containing said digital content, by using pattern matching; and  
retrieve an appropriate portion of said file for user navigation.

31. (currently amended) The system of claim 29, wherein said processor is further configured to:

obtain coordinates of said position of said input device on said tangible medium;  
determine at least one stored file corresponding to said position and containing said digital content;  
determine coordinates within said stored file, corresponding to said input device position coordinates, by using coordinate mapping; and  
access an appropriate portion of said file based on said determined coordinates to enable user navigation.

32. (new) A method for assisting navigation of digital content using a tangible medium, comprising:

receiving an instruction to access digital content corresponding to a portion of a tangible medium:

said medium being readable by a user-positionable input device, and  
said digital content being accessible from a stored file;

determining and accessing stored digital content corresponding to said input device's instantaneous position on said tangible medium;  
enabling electronic navigation of said digital content; and  
enabling use of multiple tangible media to facilitate three-dimensional navigation.

## RESPONSE

### I. The Specification Objections

Objections to the Specification have been addressed in the order raised by the Examiner.

### II. The Claim Objections

Claims 1-3, 7, 12, and 25-31 were objected to based on various informalities. These informalities will be addressed sequentially below.

#### A. Claims 1-3, 7, 12, and 25-31

The Examiner has requested that the bullet points in these claims be removed. These claims have been amended per the Examiner's request.

#### B. Claims 1, 25, and 28

These claims were objected to for allegedly lacking antecedent basis. These claims have been amended to recite "said input device's instantaneous position." Applicant respectfully submits that these amendments have overcome the Examiner's objections.

#### C. Claim 12

Claim 12 has been amended based on the Examiner's suggestions to correct typographical errors.

#### D. Claims 25-27



Claims 25-27 have been amended based on the Examiner's suggestions.

E. Claim 29

Claim 29 was objected to for allegedly having insufficient antecedent basis with respect to the phrase "said user's position." Claim 29 has been amended to recite "said input device's position." Thus, Applicant respectfully submits that the claim objection has been overcome.

III. The 35 U.S.C. §112 Rejections

Claim 11 was rejected under 35 U.S.C. 112, second paragraph, as being indefinite for lacking antecedent basis. Claim 11 has been amended to overcome this rejection.

IV. The 35 U.S.C. §102 Rejections

Claims 1-31 were rejected under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent Application Publication No. 2002/0193975 to Zimmerman ("ZIMMERMAN"). Applicant respectfully traverses the rejections.

It is axiomatic that an anticipating reference must disclose every element of the rejected claim.

A. Claim 1

Claim 1 recites a method for assisting navigation of digital content using a tangible medium, comprising:

receiving an instruction to access digital content corresponding to a portion of a tangible medium:

said medium being readable by a user-positionable input device, and  
said digital content being accessible from a stored file;

determining and accessing stored digital content corresponding to said input device's instantaneous position on said tangible medium; and enabling electronic navigation of said digital content including enabling toggling between browsing of said tangible medium and browsing of said digital content on a computer screen using said input device.

1. ZIMMERMAN Failed to Disclose or Suggest the Step of Enabling a User to Toggle between Browsing of the Tangible Medium and Browsing of the Digital Content on a Computer Screen

Claim 1 has been amended to recite enabling toggling between browsing of the tangible medium and browsing of the corresponding digital content on a computer screen using the same input device. This amended limitation has support on at least pages 4 and 14 of the Specification.

ZIMMERMAN discloses a method to manipulate electronic media by manipulating off-line media. ZIMMERMAN, paragraph 22. ZIMMERMAN does not disclose or suggest enabling a user to toggle between browsing a tangible medium and browsing its related digital content using the same input device.

Based on the foregoing, Applicant respectfully submits that ZIMMERMAN does not anticipate claim 1 which is now in condition for allowance.

B. Claims 2-21 & 23-24

Claims 2-24 are dependent on claim 1. Based on the foregoing arguments regarding claim 1, these dependent claims should also be in condition for allowance. Claim 22 has been canceled.

C. Independent Claims 25, 28 and 29

Independent claims 25, 28 & 29 include similar limitations as discussed above regarding claim 1. Thus, based on the foregoing arguments regarding claim 1, these claims should also be in condition for allowance.

D. Claims 26-27 & 30-31

Claims 26-27 & 30-31 are dependent on claims 25 and 29, respectively. Based on the foregoing regarding claims 25 & 29, these dependent claims should also be in condition for allowance.

E. New Claim 32

Original claim 22 has been rewritten into independent form as new claim 32. The Examiner cited paragraph 72 and 22 of ZIMMERMAN for allegedly disclosing the limitations in original claim 22. Applicant respectfully traverses the rejection based on the following reasons.

Paragraph 72 of ZIMMERMAN discloses taking multiple sequential sample images of the same medium for purposes of finding the matching digital file. ZIMMERMAN, paragraphs 70-74. ZIMMERMAN does not disclose or suggest using multiple tangible media to facilitate three-dimensional navigation.

Similarly, paragraph 22 of ZIMMERMAN discloses “touching the probe on a photo of the dress in the off-line magazine ... dress information from the retailer or manufacturer can be downloaded to the user.” Here again, ZIMMERMAN discloses using a single medium for obtaining a corresponding digital file (which may or may not contain three-dimensional images).

In contrast, claim 22 recites using multiple tangible media to facilitate three-dimensional navigation.<sup>1</sup> Based on the foregoing, Applicant respectfully submits that ZIMMERMAN does not disclose or suggest the limitations in original claim 22, now incorporated in new claim 32. Thus, new claim 32 should be in condition for allowance.

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<sup>1</sup> “For example, one medium might indicate a plan view, while another indicates a side view.” See page 16 of the Specification.